

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF ALABAMA, SOUTHERN DIVISION

APRIL L. YOUNG,

Plaintiff,

vs.

BOND COLLECT SERVICES, INC.,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§

CASE NO.: 10-CV-00429-WS-B

MOTION FOR LEAVE TO AMEND COMPLAINT

COMES NOW, APRIL L. YOUNG, Plaintiff in the above-styled cause, and by and through her undersigned attorney, and pursuant to Rule 15(a) of the *Federal Rules of Civil Procedure* respectfully request leave to file her Amended Complaint, which is attached hereto as Exhibit "A".

  
\_\_\_\_\_  
JAMES D. PATTERSON (PATTJ6485)  
KENNETH J. RIEMER (RIEMK8712)  
Attorneys for Plaintiff

OF COUNSEL:  
UNDERWOOD & RIEMER, P.C.  
166 Government Street, Suite 100  
Mobile, Alabama 36602  
Telephone: (251) 432-9212  
E-mail: [jpatterson@alalaw.com](mailto:jpatterson@alalaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on January 5, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

L. Jackson Young, Jr.  
Ferguson, Frost & Dodson LLP  
2500 Acton Road, Ste. 200  
Birmingham AL 35243



---

**JAMES D. PATTERSON**